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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12

13 **RONNELL RAY HILL,**

Petitioner,

15 **v.**

16 **V.M. ALMAGER, Warden,**

Respondent.

C 07-3229 JSW (PR)

**DECLARATION OF ANN P.
WATHEN**

19 I, ANN P. WATHEN, declare as follows:

20 I am the Deputy Attorney General assigned to respond to the Order to Show Cause (OSC)
21 in the present case. The state appeals were denied in 2005 and 2006.

22 As discussed below, I am requesting an additional 60 days to respond to the petition for
23 writ of habeas corpus in the instant case. During the past two months, I have filed respondent's
24 briefs in *People v. Fikes* (A116181) on October 30, 2007, a motion to dismiss in *Ortega v. Subia* (C
25 07-4541 PJH (PR)) on October 31, 2007, an opposition in *John Doe v. Brown* (San Mateo County
26 Superior Court, Case No. 466503) on November 2, 2007, respondent's briefs in *People v. Gruber*
27 (H031005) on November 9, 2007, and *People v. Langan* (A116891) on November 15, 2007, a
28 motion to abate in *People v. Mata* (H031131) on November 27, 2007, respondent's brief in *People*

1 v. *May* (A117411) on November 28, 2007, and respondent's opposition in *In re Hemmes* (H032151)
2 on November 30, 2007. I recently completed *People v. Shephard* (H030646), which is currently
3 being formatted by my secretary. I also presented an oral argument in the Ninth Circuit Court of
4 Appeal in *Hiskas v. Pliler* (06-16091) on December 6, 2007, which required several days of
5 preparation. I am presently working on *People v. Wilkins* (H030882), for which the court has issued
6 a notice pursuant to California Rules of Court, rule 8.220(a). With respect to the instant case, I have
7 obtained the file from storage and determined that the federal habeas petition is timely. I have also
8 requested a copy of the state habeas petition filed with the California Supreme Court in case number
9 S147089 on October 4, 2006, so that I may determine if appellant has exhausted all of his claims.

10 WHEREFORE, respondent respectfully requests that the time for filing a response be
11 enlarged to February 29, 2008.

12 Dated: December 24, 2007

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14
15 /s/ Ann P. Wathen
16 ANN P. WATHEN
17 Deputy Attorney General

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